

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

Case No. 18-20495

v.

Hon. David M. Lawson

IBRAHEEM IZZY MUSAIBLI,

Defendant.

\_\_\_\_\_ /

**STIPULATION TO EXTEND FILING DATE FOR RESPONSE TO  
GOVERNMENT'S MOTION TO ADMIT ISIS DOCUMENTS**

The Government intends to introduce numerous documents it alleges were recovered in Iraq or Syria and that it believes are records of the operation of the Islamic State. The Government timely provided the background and a short summary of the proposed testimony of several witnesses who have dealt with Islamic State documents and who will likely be called to authenticate the records.

The Government also indicated that it would call a cooperating witness with first-hand experience working with records on behalf of the Islamic State. However, because of the multi-layer security review involved in the release of this witness's statements across multiple proffer interviews, they could not be provided to the defense team until May 11, 2021.

Due to the importance of these documents spanning approximately 49 pages, the decision regarding their admission will likely shape the strategy of the parties as

they prepare for trial. While not a dispositive motion, this issue is complex and important to this litigation and additional time is necessary to allow the defense to team to review this material provided to the defense on May 11.

Recognizing this, the parties stipulate and agree that the reply to the Government's motion to admit ISIS documents should be due three weeks from the date that the statements were provided to the defense team.

The hearing on this motion is scheduled for June 28, 2021. The parties agree that Defendant's response should be due on June 1, 2021.

**STIPULATED BY:**

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